UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

LINDA BEDELL, THE LINDA BEDELL INDIVIDUAL RETIREMENT ACCOUNT, LANDON BEDELL, KEATON BEDELL, and INNER DESIGN, INC. PROFIT SHARING PLAN,

Plaintiffs, : Civil Action No.: 2:20-ev-3804-WB

v.

GEORGE HECKLER, MARK S. CARROW, CASSATT SHORT TERM TRADING FUND LP, CV SPECIAL OPPORTUNITIES FUND, LP, CITRIN COOPERMAN & COMPANY, LLP, TOPWATER INVESTMENT MANAGEMENT LLC, and GREEN MOUNTAIN FUND, LLC,

Defendants.

MOTION TO LIFT STAY FOR THE LIMITED PURPOSE OF OBTAINING DEFAULT JUDGMENTS AGAINST REMAINING DEFENDANTS

Plaintiffs Linda Bedell, the Linda Bedell Individual Retirement Account, Landon Bedell, Keaton Bedell, and Inner Design, Inc. Profit Sharing Plan ("Plaintiffs") hereby move this Court for the entry of an Order lifting the stay of litigation previously entered by this court, for the limited purpose of allowing Plaintiffs to obtain default judgments against the remaining defendants and terminate this litigation.

The reasons for this motion are set forth in the accompanying Memorandum of Law. A proposed Order granting the relief requested in this Motion is attached.

/s/ Ira Neil Richards

David Smith (Pa. ID No. 21480)
Ira Neil Richards (Pa. ID No. 50879)
Daniel P. Lawn (Pa. ID No. 326114)
SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 751-2000
dsmith@schnader.com
irichards@schnader.com
dlawn@schnader.com

William C. Nystrom (admitted pro hac vice) Nina S. Hirsch (admitted pro hac vice) NYSTROM BECKMAN & PARIS LLP One Marina Park Drive, 15th Floor Boston, MA 02210

Counsel for Plaintiffs

Dated: December 1, 2021